

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC  
PARTICIPATION, MARY WINTER, GENE  
STEINBERG, NANCY HART, SARAH  
WOLFF, KAREN SLAVEN, KATE KENNEDY,  
EDA DANIEL, and ANDREA SFERES,

-and-

People of the STATE OF NEW YORK, by its  
attorney general, LETITIA JAMES, ATTORNEY  
GENERAL OF THE STATE OF NEW YORK,

Plaintiffs,

v.

JACOB WOHL, JACK BURKMAN, J.M.  
BURKMAN & ASSOCIATES, LLC, PROJECT  
1599, MESSAGE COMMUNICATIONS, INC.,  
ROBERT MAHANIAN, and JOHN and JANE  
DOES 1-10,

Defendants.

Civil Action No. 20-cv-8668

**DECLARATION OF RICK SAWYER IN SUPPORT OF PLAINTIFFS' JOINT MOTION  
FOR SUMMARY JUDGMENT AS TO LIABILITY ON ALL CLAIMS**

I, Rick Sawyer, declare as follows:

1. I am an active member of the New York Bar and am associated with the New York State Office of the Attorney General. I represent the People of the State of New York in this matter.

I make this declaration based on my personal knowledge.

2. Based on a review of documents produced in discovery and developed during the Attorney General's investigation of this matter, Defendants' robocall was sent to a total of 85,307 phone numbers. Of those phone numbers, 5,494 had New York area codes.

3. The area codes broke down as follows:

- (212): 4,186 calls
- (315): 2 calls
- (347): 198 calls
- (516): 2 calls
- (518): 7 calls
- (585): 1 call
- (607): 11 calls
- (631): 3 calls
- (646): 703 calls
- (716): 1 call
- (718): 34 calls
- (845): 4 calls
- (914): 2 calls
- (917): 170 calls
- (929): 170 calls

4. These numbers are derived from the analysis of a comprehensive call log with 85,307 separate entries. The full log can be made available for the Court's review if necessary.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on July 29, 2022

By: /s/ Rick Sawyer

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